MEMO

To: Michael Torres, Remedial Project Manager, United States Environmental Protection Agency

From: Scott Lindenmuth, Technical Coordinator, SBA Shipyard PRP Group

CC: Beth Hesse, Project Coordinator, SBA Shipyard PRP Group
Tommy Doran, Louisiana Department of Environmental Quality
I-Jung Chiang, United States Environmental Protection Agency
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Date: January 15, 2019

Re: Bi-Monthly Progress Report #2; November – December 2018
Remedial Investigation/Feasibility Study
SBA Shipyard Superfund Site, Jennings, Jefferson Parish, Louisiana
EPA ID: LAD008434185

EHS Support LLC ("EHS Support"), on behalf of the SBA Shipyard Potentially Responsible Party (PRP) Group (PRP Group), is providing this Bi-Monthly Progress Report associated with Remedial Investigation and Feasibility Study activities being conducted at the SBA Shipyard Superfund Site located in Jennings, Jefferson Davis Parish, Louisiana (Site). This progress report is being provided in accordance with the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study (Settlement Agreement) between the United States Environmental Protection Agency (USEPA) and PRP Group Respondents dated October 25, 2016; amended March 7, 2018.

Description of Actions Taken to Comply with Settlement Agreement

Project Work Performed in November and December 2018

Actions taken during November and December 2018 to comply with the Settlement Agreement consisted of implementing activities described in the Remedial Investigation (RI)/Feasibility Study (FS) Work Plan, dated May 17, 2018 (Work Plan) and approved by USEPA on July 19, 2018, laboratory data validation and evaluation, and other administrative tasks.

Field Work


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The following field work tasks were completed on November 1 and 2, 2018.

- Completed surveying of all soil boring, monitoring wells, and surface water staff gauge locations.
- Installed groundwater level transducers in all monitoring wells with the exception of MW-15 and installed one transducer within surface water near MW-05 to evaluate groundwater/surface elevations.

- Collected waste characterization samples of soil cuttings and purge water for disposal purposes.
- Collected groundwater samples from remaining monitoring wells not sampled in October.

Field work data processing, data validation, and evaluation continued in November and December 2018. All laboratory data has been received and uploaded to the project database. Data validation is being completed in accordance with the Quality Assurance Project Plan (QAPP) and is approximately 75%. complete.

Analytical Data Validation and Evaluation

Laboratory data results are undergoing a preliminary screening process and being compared to the human health and ecological screening criteria established in the Work Plan. Sample results are being evaluated to determine if two key objectives have been satisfied:

- Is the dataset sufficient to determine the nature and extent of contamination?
- Is the dataset sufficient to support statistically-defendable human health and ecological risk assessments?

The results of the screening level data assessment will be provided in the forthcoming Preliminary Site Characterization and Data Gap Assessment Technical Memorandum (Tech Memo), which is scheduled to be submitted to USEPA and Louisiana Department of Environmental Quality (LDEQ) on January 25, 2019, in accordance with the schedule provided in the Work Plan. Recommendations for additional data collection will be provided, if necessary, to satisfy these two objectives.

Project Management, Communication and Reports

- The first bi-monthly progress report, which described activities completed in September and October 2018, was submitted to USEPA and LDEQ on December 15, 2018.
- The PRP Group submitted a request for a reduction in financial assurance, pursuant to Section XXVI Financial Assurance (paragraphs 106-111) of the Settlement Agreement. This request was submitted to USEPA on January 4, 2019.

Results of Sampling and Tests

As noted above, sample results are currently undergoing quality assessment/quality control (QA/QC) and data validation procedures, in accordance with the QAPP. Sample results and the results of the screening level assessment will be provided in the Preliminary Site Characterization and Data Gap Assessment Technical Memorandum, which will be submitted to USEPA and LDEQ on January 25, 2019.

Description of Work Planned for Next Two Months

Work performed or planned for January and February 2019 will consist of the following:

- QA/QC and data validation procedures will be completed, in accordance with the QAPP.
- An initial assessment of site conditions and comparison of sample results against human health and ecological screening criteria will be completed using results of sampling performed during the RI fieldwork. A technical memorandum will be provided that includes sample results,

updated figures, and an assessment of remaining data gaps related to the objectives of establishing the nature and extent of contamination and whether a sufficient dataset has been collected to perform human health and ecological risk assessments. In accordance with the schedule provided in the Work Plan, submittal of the Tech Memo is anticipated on January 25, 2019. Recommendations for supplemental data collection will be provided in the Tech Memo, as warranted.

- The next quarterly groundwater sampling event will be completed the week of February 4, 2019.

Exceptions to the Work Plan

The groundwater column in several monitoring wells was not sufficient (i.e. water column was not long enough) to perform the slug tests proposed in the Work Plan. The SBA Group is evaluating alternative methods for calculating site-specific hydraulic conductivity values, such as aqueous bail-down tests, which will be completed during a future field deployment.

Please call Scott Lindenmuth at (312) 882-3705 or Beth Hesse at (828) 551-9067 if you have any questions regarding this progress report.